

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re)	
)	Chapter 11
TEAM SYSTEMS INTERNATIONAL, LLC ¹)	
)	Case No. 22-10066 (CTG)
)	
)	Hearing Date: March 9, 2022 at 9:00 am
)	Obj. Due: March 2, 2022 at 4:00 pm
)	
Debtor.)	
)	
)	

MOTION TO WITHDRAW AS COUNSEL

Robinson & Cole, LLP (the “Firm”), counsel of record for Team Systems International, LLC (the “Debtor”)², moves the court to withdraw as counsel in the above-captioned matter, and states as follows:

1. On or about January 14, 2022, the Firm was engaged to provide legal services for the Debtor in the above captioned bankruptcy matter which services included filing the petition under Chapter 11 of the Bankruptcy Code.

2. Since that time, circumstances and resulting irreconcilable differences have arisen that necessitate that the Firm withdraw as counsel pursuant to Delaware Lawyers Rules of Professional Conduct 1.16(b)(4), 1.16(b)(5), and 1.16(b)(7).

3. Specifically, good cause exists to withdraw as counsel for the following reasons:

¹ The Debtor in this chapter 11 case has a last four digit federal tax ID of 8411. The location of the Debtor’s service address in this chapter 11 case is 16192 Coastal Highway Lewes, Delaware 19958.

² The Firm has not yet formally been retained as the Court has not yet considered the Motion to Retain Robinson & Cole LLP as counsel for the Debtor.

- a. Failure of the Debtor to fully cooperate as is necessary to enable the Firm to properly discharge its responsibilities and obligations as Debtor's counsel in this bankruptcy case;
- b. Failure of the Debtor to promptly communicate necessary information to enable the Firm to discharge its responsibilities to the Court and the Debtor as required under the Delaware Lawyer's Rules of Professional Conduct; and
- c. The existence of significant differences of opinion between Debtor and the Firm that makes continuing the representation unnecessarily difficult.

4. The issues set forth above have created conditions whereby the Firm is not able to continue to represent the Debtor in this bankruptcy case consistent with its obligations to both the Court and the Debtor as required under the Delaware Lawyer's Rules of Professional Conduct.

5. The Firm does not include details surrounding the reasons for the need to withdraw as counsel so as to not prejudice the Debtor or otherwise disclose any attorney/client communications.³

6. The Firm has notified the Debtor in advance of this Motion that it intends to withdraw as counsel. The Firm has explained to the Debtor the status of this bankruptcy as well as the potential consequences of the Firm's withdrawal. The Debtor has requested that Robinson & Cole include the statement attached hereto as Exhibit "B." This statement is solely that of the Debtor and by attaching it counsel does not adopt or otherwise agree with the contents of the statement in any way.

³ The Firm is available to the Court for an *in camera* discussion should the Court believe one is necessary.

7. A copy of this Motion is being concurrently sent to the Debtor, through Deborah Evans Mott and Steven Acosta, the two members of Debtor that constitute its Management Committee, via email.

CONCLUSION

WHEREFORE, Robinson & Cole, LLP respectfully requests that the Court enter an order substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein permitting the Firm and its attorneys to withdraw their appearance as counsel for the Debtor and granting such other further relief as the Court deems proper under the circumstances.

Dated: February 18, 2022
Wilmington, Delaware

/s/ Jamie L. Edmonson
Jamie L. Edmonson (No. 4247)
Curtis J. Crowther (No. 3238)
James F. Lathrop (No. 6492)
ROBINSON & COLE LLP
1201 N. Market Street, Suite 1406
Wilmington, DE 19801
Tel: (302) 295-4800
Fax: (302) 351-8618
Email: jedmonson@rc.com
ccrowther@rc.com
jlathrop@rc.com

Proposed Counsel for the Debtor